

REMARKS

Applicant appreciates the Examiner's thorough consideration provided in the present application. Claims 1-17 are currently pending in the instant application. Claims 1 and 15 have been amended. Claim 1 is independent. Reconsideration of the present application is earnestly solicited.

Allowable Subject Matter

Applicant appreciates the Examiner's indication of allowable subject matter. Specifically, the subject matter of claims 4-17 has been indicated as being allowable if rewritten to overcome the rejections under 35 U.S.C. § 112, second paragraph identified by the Examiner. As described in greater detail hereinafter, Applicant submits that all of the claims should be allowed and the present application should be passed to Issue.

Priority

Applicant appreciates the Examiner's indication of acceptance of the certified copy of the corresponding priority document for the present application.

Drawings

Applicant requests the Examiner's indication of acceptance of the formal drawings filed on June 25, 2003. Since the Examiner has not cited any informalities with the drawings, and a Notice of Draftperson's Patent Drawing Review (PTO-948) has not been included with this Office Action, Applicant submits that the formal drawings file on June 25, 2003 should be approved by the Examiner. Accordingly, Applicant is not required to take any further action with respect to the drawings.

Claim Rejections Under 35 U.S.C. § 112

Applicant appreciates the Examiner's identification of potential minor informalities with the claims. These objections are respectfully traversed.

In light of the foregoing amendments to the claims, Applicant respectfully submits that these rejections have been obviated and/or rendered moot. However, Applicant respectfully submits that the foregoing non-narrowing amendments have been made to merely clarify the claimed invention for the benefit of the Examiner and to address minor informalities that should have been merely objected to by the Examiner.

Without conceding the propriety of the Examiner's rejections, but merely to timely advance the prosecution of the application, Applicant has

incorporated the changes recommended by the Examiner. Applicant submits that the requested changes do not appear to either raise a substantial question of the patentability of the claimed invention nor do they narrow the scope of the claimed invention.

Information Disclosure Statement

Applicant appreciates the Examiner's acknowledgment of the receipt and consideration of the Information Disclosure Statement filed on September 25, 2003.

Claim Rejection Under 35 U.S.C. § 102

Claims 1-3 have been rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by Huang et al. (U.S. Patent No. 6,447,208). This rejection is respectfully traversed.

In light of the foregoing amendments to the claims, Applicant respectfully submits that all of the rejections have been obviated and/or rendered moot. Without conceding the propriety of the Examiner's rejection, but merely to expedite the prosecution of the present application, Applicant has amended claim 1 to clarify the claimed invention for the benefit of the Examiner. Accordingly, this rejection should be withdrawn.

Applicant submits that the prior art of record fails to teach or suggest each and every limitation of the unique combination of limitations of the claimed invention, including the feature(s) of: "at least one operational module, said upper beam structure (5) forming a system of lateral beams (7) arranged to allow one or more of said operational modules (8) to be placed upon or adjacent to the columns (4), wherein the operational modules are placed next to the lateral beams (7), either directly on the columns (4), on brackets (10) connected to the columns (4) or on a deck arranged between upper ends of the columns (4) and said operation modules (8), the lateral beams (7) protruding vertically upwards above a bottom plane (11) of the operation modules (8)." Accordingly, this rejection should be withdrawn.

The Examiner has indicated that Huang et al. teach that a semi-submersible offshore platform having an upper beam structure with lateral beams which protrude vertically upwards from equipment (the Examiner has pointed to Fig. 7 and the abstract of Huang et al.). Huang et al appears to refer to a so called Tension Leg Platform (TLP), and not a semi-submersible offshore platform. Further, the Examiner incorrectly equates any equipment in Huang et al mounted within the open truss design "sandwich" between the sub deck (608,708) and the flat top deck (608, 709) with the large, separate operational modules described in the present application. The applicant respectfully

submits that there is no description whatsoever of corresponding operational modules in Huang et al, and that Huang et al therefore cannot possibly anticipate claims 1-3 of the present application. Accordingly, this rejection should be withdrawn.

Further, as seen in Fig. 7 of Huang et al., any modules even if added to Huang et al. would necessarily have to be placed upon the flat top deck. Therefore, even if the plain rectangular boxes shown in Figs. 6 and 7 of Huang et al were considered operational modules, these are clearly placed upon the flat top deck where NO lateral beams protrude vertically upwards above a bottom plane of the operation modules, as disclosed in the present invention. Furthermore, the "equipment" beneath the flat top deck, as apparently referred to by the Examiner, cannot be defined as modules analogous to the claimed invention.

Generally, apart from the underwater structure, Huang et al describes an open truss, twin deck design, which is well known in the background art. The flat top deck of Huang et al. is explicitly described in column 9, lines 38-40 of the cited document (emphasis added) as: "The platform 500 includes a *substantially flat top deck 502 supported on a sub deck 504 by top deck support members 506.*" Furthermore, in column 10, lines 7-12: "The Platform 600 includes an oil derrick 602 supported on a *deck support structure 604.* The

deck support structure 604 includes *a substantially flat top deck 606 supported on a sub deck 608 by top dock support members.*"

Applicant submits that the above-recited portions of Huang et al clearly show that the fiat top deck is the only deck upon which any operational modules could hypothetically be placed, although no indications of any such modules are disclosed in Huang et al. Accordingly, the flat top deck of Huang et al is similar to the flat top decks disclosed in, for example GB 2 259 536 and WO/23690 and clearly does not anticipate the claimed invention of claims 1-3.

In accordance with the above discussion of the patents relied upon by the Examiner, Applicants respectfully submit that these documents, either in combination together or standing alone, fail to teach or suggest the invention as is set forth by the claims of the instant application.

As to the dependent claims, Applicants respectfully submit that these claims are allowable due to their dependence upon an allowable independent claim, as well as for additional limitations provided by these claims.

CONCLUSION

Since the remaining references cited by the Examiner have not been utilized to reject the claims, but merely to show the state-of- the-art, no further comments are deemed necessary with respect thereto.

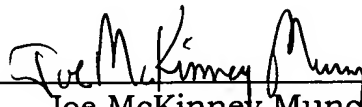
All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently pending rejections and that they be withdrawn.

In the event there are any matters remaining in this application, the Examiner is invited to contact Matthew T. Shanley, Registration No. 47,074 at (703) 205-8000 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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